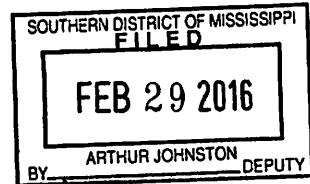


In The United States District Court
For The Southern District of Mississippi
Jackson Division



John Hale
✓
Roland Abangan et al.

3:15cr170

Affidavit of John Hale

Comes now John Hale and Stakes The
Following Matters And Facts.

(1) My Name is John Hale. I am over The
age Of Twenty-one [21] years of age. I have
Personal Knowledge of The facts And Matters Contained
herein And am Competent To Testify ThereTo

(2) Plaintiff Suffers from Serious Medical
Needs Both Physical And Mental Health Related
Needs That Effect My Daily lifes Activities

(3) Plaintiffs Disorders And Conditions have
Been Diagnosed And Treated By V.A. Doctors Since
The Early 80's, Many Of These Conditions its Obvious
To Even A Lay Person They Require Treatment.

(4) Each Separately And in Combination Effect My

Daily life's Activities And Are Deliberately When not Treated.

[5] Plaintiff Suffers from Gastroesophageal - Reflux Disorder D/I/O, Degeneration Of lumbar/lumbosacral intervertebral disc's [intensely painful Degeritive, Ruptured and Bulging Compressed Black Disc], Herniated Disc., Vitamin D Deficiency., Splenomegaly, Cholelithiasis, Furunculosis, Anti-Social Personality D/I/O, Depressive D/I/O[Chronic] Post Traumatic - Stress D/I/O [PTSD], intermittent explosive D/I/O,, Gallstones,:

[6] These Disorders Effect my eating [D.r.t], Sleeping [sleep Deprivation & Insomnia], Thinking & Concentrating, walking, Sitting, Standing Both physically And psychologically These D/I/O's Also Effect My Major Body Functions and Organs, ie Digestive, Renal, Circulatory, Kidney Functions Liver function Metabolism, They Effect how I will interact With My Peers.

[7] These Disorders Are Serious Disabilitys By Them Self, And in Combination With Each Other And Are Serious Physical And Mental Health Needs That Require Treatment

[8] Plaintiff Submits Portions of V.A. Medical Records With Certificates Of Authenticity: [see EX VA] These Records Show My Serious Medical needs That They Require Treatment, And were Being Treated

[9] These Records Show That My Requested Meds To Accommodate My Disability Related Needs Are

Reasonable As Related To My Individualized Treatment They Also Show Evidence That I'm Not Seeking Medication To Abuse Them But for Legitimate Use And Treatment of My Serious Medical And Mental Health Needs.

Plaintiff Also Submits Scientific Evidence from The National Institutes of Health, The American Liver Foundation, Medline Plus/ NIH, These Exhibits Support My need for Accommodation To Avoid Toxicity Issues And Damage To My Health.

[10] This Scientific Evidence Was Published Beginning Back in 2003 By The American Liver Foundation And has been Confirmed Over The Years By The N.I.H, The Hepatitis Foundation, It Shows That Hep-C Patients Need To Avoid Certain Medications And need To Adhere To Special Diets.

[11] Plaintiff Submits, Health Care Guideline from The Institute for Clinical Systems Improvement [ICSI] Showing Ultram/Tramadol as a reasonable Alternative, Also Submitted is An Article from The Scientific American Related To Misconceptions about Addiction

[12] Plaintiff Cites House Resolution, H.R. 3244, Section 1603 Congress Passed and President Clinton Signed This into Law on Oct 31, 2000 Clearly Establishing My Right To Adequate, Meaningful Pain Management, --- Congress Declared The first Decade of The 21st Century. The

Decade of Pain** Control* And Research

[13] Plaintiff Submits That his Serious Medical and Mental Health Needs Are not being Adequately Treated That The Denial is intentional And On Purpose, That Plaintiff has Consistently Made These Needs Known And Requested Reasonable Accommodation for his Disability Related Needs That have also been Denied,

[14] Plaintiff Submits That The Issues Of his Serious Medical & Psychiatric Needs And his Disabilities Are Inextricably intertwined And Complicated, Each Effects The other. And The 8th And 14th Amendment with The ADA Can't be Separated

Respectfully Submitted This The
23 day of feb 2016 Under Penalty of Perjury as True & Correct

By John Hale
Pro-se

John Hagle # 24120

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